requests. As indicated in the February 24, 2020 Joint Status report, Plaintiffs had certain

JOINT STATUS REPORT AND [PROPOSED] ORDER No. 2:18-cv-01442-JLR – Page 1



1	questions for Defendants relating to one category of documents responsive to the FOIA
2	requests at issue in this litigation. Counsel for Defendants, a representative of the
3	Department of Health and Human Services, outside counsel for HRDC, and the general
4	counsel of HRDC discussed those issues in March of 2020. Plaintiffs have identified two
5	outstanding issue for Defendants to address, upon which Defendants are actively working.
6	The Parties are hopeful that the Defendants' response to those issues will reveal whether
7	this case will need to be substantively litigated further, or if the only remaining issue is the
8	potential award of fees and costs.
9	In light of the above information, the Parties propose that a joint status report be
10	filed approximately one month from today, on or before May 1, 2020.
11	Dated: March 27, 2020 Respectfully submitted,
12	
13	ARETE LAW GROUP PLLC
14	By: /s/ Jeremy E. Roller
15	Jeremy E. Roller, WSBA No. 32021 1218 Third Avenue, Suite 2100
16	Seattle, WA 98101 Telephone (206) 428-3250
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18	Attorneys for Plaintiffs The Human Rights Defense Center and Michelle Dillon
19	Dejense Center una Michette Ditton
20	BRIAN T. MORAN
21	United States Attorney
22	By: <u>/s/ Michelle R. Lambert</u> Michelle R. Lambert, NYS # 4666657
	Assistant United States Attorney
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26	michelle.lambert@usdoj.gov
	Attorneys for Defendants

1	ORDER
2	It is hereby ORDERED that:
3	The parties shall submit a joint status report to the Court on or before May 1, 2020.
4	Dated this 27th day of March, 2020
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6	Jun R. Plut
7	-)
8	JAMES L. ROBART United States District Judge
9	Cinica States District vauge
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2	CERTIFICATE OF SERVICE
3	I hereby certify that on this date, I electronically filed the foregoing document with
4	the Clerk of the Court using the CM/ECF system, which will send notification of such filing
5	to the following:
6	MICHELLE R. LAMBERT, NYS #4666657
7	Assistant United States Attorney United States Attorney's Office
	700 Stewart Street, Suite 5220
8	Seattle, Washington 98101 Phone: (206) 553-7970
9	Fax: (206) 553-4073 Email: michelle.lambert@usdoj.gov
10	
11	Attorneys for Defendants
12	DATED: March 27, 2020, at Seattle, Washington.
13	DATED. Watch 27, 2020, at Scattic, washington.
14	s/ Annabel Barnes Annabel Barnes, Legal Assistant
15	Aimabel Barnes, Legal Assistant
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